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June 9, 2022

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, New York 10007

**Re: *Gernette Cowell v. Target Corporation***  
**Docket No.: 1:21-cv-08289-RA**

Dear Judge Abrams:

We represent Defendant, Target Corporation ("Target"), in connection with the above-referenced matter. We are writing on behalf of both parties to request an extension of the upcoming expert discovery deadline while the parties participate in private mediation. The current expert discovery deadline is July 1, 2022. The parties also respectfully request an adjournment of the Post-Discovery Conference scheduled for July 1, 2022 at 4:30 PM.

As noted in the parties' letter to the Court dated May 2, 2022, the parties have been engaging in settlement discussions. To that end, the parties have scheduled a private mediation on July 7<sup>th</sup> with NAM. Therefore, the parties respectfully request that the expert discovery deadline be extended to August 8<sup>th</sup> and that the Post-Discovery Conference scheduled for July 1<sup>st</sup> be adjourned to a date that is convenient to the Court.

We thank Your Honor for consideration of the above.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Sierra N. Kresin'.

Sierra N. Kresin

June 9, 2022

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CC (via ECF & E-Mail):

Kevin S. Klein, Esq.

**ROSENBAUM & ROSENBAUM, PC**

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**GERNETTE COWELL**

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Application granted. The conference presently scheduled for July 1, 2022 is hereby adjourned to August 12, 2022 at 4:00 p.m.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams

6/10/22